



Date: February 15, 2022

Bill: SB 528 Climate Solutions Now Act of 2022

Position: Favorable with Amendments

Dear Chair Pinsky and Members of the Committee:

The National Aquarium respectfully requests a favorable report with amendments for **SB 528 – Climate Solutions Now Act of 2022**, which sets necessarily ambitious climate goals and outlines a plan to achieve them.

Combatting climate change is one of the National Aquarium’s three strategic conservation goals. We do this through a holistic, solutions-focused approach, which includes translating ocean and climate science, building resilience through community empowerment, implementing nature-based solutions, and reducing our own carbon footprint. We applaud the comprehensive approach of this critically necessary legislation. It is incumbent that governments at every level focus on reducing greenhouse gas emissions rapidly while prioritizing a just transition away from fossil fuels. We support this legislation because it promotes climate equity, centers environmental justice, and addresses the highest emitting sectors: transportation, energy consumption, and buildings.

The National Aquarium began reducing our carbon footprint more than a decade ago and is charting a course to reach net-zero across our buildings and operations. **We expect to meet or exceed the net-zero goal for covered buildings as outlined in the bill.** However, our ability to reach net-zero depends on the state meeting its greenhouse gas emissions reductions goals. If the state is unable to decarbonize its electricity sources on schedule, the Aquarium will have limited options to source enough clean energy and will likely incur additional costs and delays.

Based on our ongoing experience, we offer the following recommendations for amendments to the Building Emissions Standards to strengthen the legislation and support its effective implementation.

- 1. Net greenhouse gas emissions should be explicitly defined to include Scope 1 (direct) and Scope 2 (indirect) emissions.¹**

In pursuit of our net-zero goal, the Aquarium has completed a greenhouse gas emissions inventory study. Since 2010, the Aquarium has reduced its Scope 1 and Scope 2 greenhouse gas emissions by 29%. Reducing the Aquarium’s direct, or Scope 1, emissions is a crucial part of our goal to reach net-zero. However, less than a quarter of the Aquarium’s emissions are a result of Scope 1 emissions, mainly from natural gas boilers.

Currently, nearly two-thirds of the Aquarium’s emissions come from the electricity supplied to the Aquarium (Scope 2 emissions). Scope 2 emissions are a major component of the overall greenhouse gas emissions for many buildings and should not be ignored. This approach is consistent with how other jurisdictions have approached emission reduction. For example, the

¹ According to the U.S. EPA, Scope 1 emissions are direct emissions that occur from sources that are controlled or owned by an organization. Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling and are a result of an organization’s energy use.

city of Boston's recently enacted Building Emissions Reduction and Disclosure Ordinance² includes Scope 2 indirect emissions into their calculation of greenhouse gas emissions.

Incorporating Scope 2 emissions into the definition of net greenhouse gas emissions also gives organizations the flexibility to reduce their overall emissions in a way that fits their unique circumstance. For example, organizations should not be penalized for prioritizing reductions in Scope 2 emissions, especially where reductions to Scope 1 emissions could take longer to achieve, require long term investments, and/or represent less of the organization's overall emissions. We urge the state to clarify that net greenhouse gas emissions includes both Scope 1 and Scope 2 emissions.

- 2. Clarify that the emissions reductions targets are for all covered buildings on a collective basis, not individual buildings, and explicitly direct the Department to develop reasonable reduction targets by sector or building use.**

The state should make clear that the goal of the Building Emissions Standard is to reduce emissions of all covered buildings collectively by the targets outlined in the bill, not to reduce the emissions of individual buildings by the targets outlined in the bill. Additionally, this legislation should direct the Department of Environment to develop reasonable reduction targets by sector or building use. This approach is also consistent with Boston's Building Emissions Reduction and Disclosure Ordinance, which sets individual emission standards by 14 different building use types that are further broken down into different sectors.

If this bill is interpreted to require individual buildings to reduce emissions from their own baseline, it will penalize organizations who have already made significant progress in reducing their emissions and reward those who have not started yet.

The Aquarium strongly supports comprehensive climate solutions that focus on greenhouse gas emissions reductions. Our organization expects to meet or exceed the state's net-zero emissions goal. However, Maryland must carefully implement these goals in a way that does not penalize organizations and that understands each organization's journey may look different. **We urge the Committee to issue a favorable report with amendments on SB 528.**

Contact:

Ryan Fredriksson

Vice President, Government Affairs

410-385-8276

rfredriksson@aquarium.org

² Ordinance Amending City of Boston Code, Ordinances, Chapter VII, Sections 7-2.1 and 7-2.2, Building Energy Reporting and Disclosure (BERDO 2.0). <https://www.boston.gov/sites/default/files/file/2021/07/Docket%20%230775.PDF>